

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JONATHAN I. GEHRICH, on behalf of)	
Himself and other similarly situated)	
)	
Plaintiff,)	
)	Case No.: 1:12-cv-5510
v.)	
)	Hon. Gary Feinerman
CHASE BANK USA, N.A.,)	
)	
Defendant.)	
)	
)	

UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendant Chase Bank USA, N.A. (“Chase”) hereby moves for a 30-day extension of its deadline to answer or otherwise respond to Plaintiff Jonathan I. Gehrich’s Complaint because the parties continue to await the production of documents pursuant to Plaintiff’s third party subpoena issued at the end of August. These documents are expected to significantly shape the matter. The parties anticipate that this will be the last extension Chase seeks to answer or otherwise respond. Plaintiff does not oppose this 30-day extension. In support of its motion, Chase states as follows:

1. Plaintiff filed the Complaint on July 12, 2012, and moved for class certification the same day.
2. Plaintiff served Chase on July 24, 2012.
3. Chase last filed a Unopposed Motion for Extension of Time on September 7, 2012, which this Court granted on September 10, 2012.

4. Under this Court's September 10, 2012 Order, Chase must file an answer or otherwise respond to the Complaint on October 15, 2012, and the parties are required to file an Initial Status Report on November 13, 2012.

5. As Chase previously represented, after Plaintiff served Chase, the parties initiated discussions regarding the underlying facts, which remain on-going. On August 24, 2012, the parties conducted the planning conference referenced by Federal Rule of Civil Procedure 26(f) and Local Rule 26.1. Subsequent to that conference, Plaintiff issued a subpoena to T-Mobile USA, Inc. for the production of documents relating to Plaintiff.

6. As of October 9, 2012, T-Mobile has not produced any documents, but a production is expected shortly. The parties believe that the T-Mobile documents may significantly influence the direction of this litigation.

7. Judicial efficiency is best served by fostering these discussions because they will allow (i) Chase to better respond to the Complaint, (ii) the parties to focus potential discovery needs, and (iii) the parties to potentially engage in settlement discussions.

8. Accordingly, and with Plaintiff's consent, Chase respectfully requests that:

1. Chase have until November 13, 2012 to answer or otherwise respond to the Complaint.
2. The initial status hearing be moved to December 18, 2012, or other such date as the Court sets.

CONCLUSION

WHEREFORE, for the reasons set forth above, Chase respectfully requests a 30-day extension of its time to answer or otherwise respond to the complaint and a rescheduling of the initial status hearing.

DATED: October 10, 2012

Respectfully submitted,

/s/ Michael Y. Scudder, Jr.

Michael Y. Scudder, Jr.
Lara A. Riley
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
155 N. Wacker Drive
Chicago, IL 60606
Tel: (312) 407-0700
Fax: (312) 407-0411

Attorneys for Defendant
CHASE BANK USA, N.A.

CERTIFICATE OF SERVICE

Michael Y. Scudder, Jr., an attorney, hereby certifies that, on October 10, 2012, he caused a true and correct copy of the foregoing Unopposed Motion for Extension of Time to be served via the Court's CM/ECF filing system on the following:

Alexander H. Burke
aburke@burkelawllc.com

/s/ Michael Y. Scudder, Jr.

Michael Y. Scudder, Jr.